
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
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 :
 :
v. :
 :
WILLIAM MOREHOUSE :
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I, Lucille M. Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about September 27, 2006, in Hudson County, in the District of New Jersey, and elsewhere, defendant WILLIAM MOREHOUSE did:

knowingly and wilfully possess material which contained at least three images of child pornography, as defined in 18 U.S.C. § 2256, which were shipped and transported in interstate and foreign commerce, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

I further state that I am a Special Agent for United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Lucille M. Pezzullo, Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,
October 17, 2006 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Lucille M. Pezzullo, a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about September 27, 2006, law enforcement officers conducted a search of a computer located at 860 Devon Street, Kearny, New Jersey, the residence of defendant William Morehouse (hereinafter “defendant MOREHOUSE”).

2. On or about September 27, 2006, law enforcement officers reviewed the contents of defendant MOREHOUSE’s computer hard drive which was found in defendant MOREHOUSE’s residence. Among the files on the hard drive, which was manufactured in Malaysia, were more than two hundred and fifty (250) images of what appear to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of the images, which were found on defendant MOREHOUSE’s computer hard drive, are described as follows:

- a. **Image Number One:** This image depicts a prepubescent female performing fellatio on an adult male. The prepubescent female is seated on a white surface, with one leg stretched out straight in front of her and the other bent at the knee with her foot resting on the white surface. The prepubescent female, who is fully nude, is leaning back upon a multi-colored pillow, and is visible from her head to her ankles. Both hands of the prepubescent female are on the erect penis of the adult male. The adult male is fully nude and visible from his lower abdomen to his upper thighs. The right hand of the adult male is resting on his right buttock.
- b. **Image Number Two:** This image depicts a prepubescent female bound in a sexually explicit manner. The female is nude from the waist down and is wearing a yellow shirt. She is lying on her stomach on a multi-colored surface with her hands bound at the wrists behind her back using a grayish colored tape. Her legs are parted and she is bound at the ankles by a grayish colored tape, which is connected to a white rope. The genital area of the prepubescent female is visible.
- c. **Image Number Three:** This image depicts a prepubescent female who is fully nude and lying on her back on a tan-colored surface. The female is visible from her head to her thighs. Her left arm is bent at the elbow at a ninety degree angle and resting on the surface with her hand near her head. Her right arm is bent at the elbow, and resting on the bed, with her forearm and hand pointed toward the ceiling. The female has the words “cut me” and “hurt me” written on her horizontally in a red substance, beginning at her breast area and continuing to her genital area.

3. Based upon my training and experience, and to the best of my knowledge, the images described in paragraphs 2a through 2c above, were downloaded from the Internet, based upon, among other things, defendant MOREHOUSE's own statements.

4. On or about September 27, 2006, law enforcement agents interviewed defendant MOREHOUSE who stated, in substance and in part, that a) he had purchased and downloaded images and videos of child pornography from the Internet to the hard drive of his computer; and b) that he believed that the images of child pornography he had viewed depicted actual children.